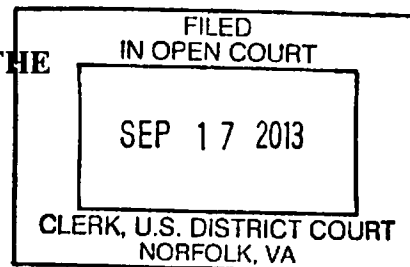


**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**



UNITED STATES OF AMERICA

v.

VICTOR F. WASHINGTON

Criminal No. 2:13cr99

STATEMENT OF FACTS

If this case had proceeded to trial, the government would have been able to prove the following facts beyond a reasonable doubt:

On April 18, 2013, Homeland Security Investigations (HSI) and the Virginia Beach Police Department (VBPD) received information from a Cooperating Defendant (CD) that an individual known as "Big Homie," later identified as Victor F. Washington, was involved in the distribution of cocaine. The CD said that he had been buying 1 to 4 ounce quantities of cocaine from Washington, and had purchased 2 ounces of cocaine from him the day before. He estimated that he had made approximately 12 such purchases in the preceding months.

On April 19, 2013, the CD working with the VBPD, arranged to meet with Washington to receive approximately 7 ounces of powder cocaine. VBPD detectives approached Washington while he was seated in a rental vehicle in an apartment parking lot in Virginia Beach. Washington attempted to flee the parking lot in the rental vehicle and struck an unmarked police vehicle. Washington was arrested, and approximately 7 ounces of suspected cocaine was found inside the rental vehicle. Washington was advised of and waived his rights, and stated that he sold cocaine and had not been recently employed.

Washington attempted to conceal from the Virginia Beach detectives the location of his residence, but further investigation revealed that he lived on Stedwick Court in Virginia Beach,

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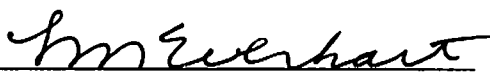
VA, with his girlfriend and his son. This residence is part of the same apartment complex where Washington was arrested.

A search warrant was obtained for the apartment on Stedwick Court by Detective Mike Gates of the VBPD. VBPD Detectives and HSI Special Agents executed the search warrant on April 19, 2013. During the execution of the search warrant, \$79,106 was located under the covers of the bed, in a drawer containing women's underwear and in the bedside table, all of which were in the master bedroom. In addition, a Bulova watch, a gold necklace and various bank account information in Washington's name and in the name of his girlfriend, Jessica Singletary, were seized by law enforcement. Singletary denied any knowledge of the money found at the residence, but did state that she had a safety deposit box at Wells Fargo that contained money that Washington had given to her.

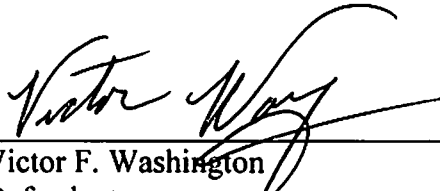
On April 20, 2013, a search warrant was obtained for the Wells Fargo safety deposit box and \$19,600 was located and seized. \$3,918.58 was also seized from three bank accounts belonging to Singletary.

On May 17, 2013, the suspected cocaine was submitted to the Virginia Department of Forensic Science, Eastern Laboratory for analysis. On June 6, 2013, VBPD received the Certificate of Analysis, which reflected that the cocaine recovered from Washington totaled 194.2 grams.

NEIL H. MACBRIDE
UNITED STATES ATTORNEY


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Defendant's Signature: After consulting with my attorney and pursuant to the plea agreement entered into this day between myself, the United States and my attorney, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



Victor F. Washington
Defendant

Defense Counsel's Signature: I am Victor F. Washington's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



James O. Broccoletti, Esq.
Attorney for the Defendant
Randall J. Leeman, Jr.

VW
RJC
JME